

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ELMER CAMPBELL, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION NO. C-1-01-527
)	
v.)	JUDGE: BECKWITH
)	MAGISTRATE JUDGE: HOGAN
INTERNATIONAL PAPER,)	
SUN CAPITAL PARTNERS, INC.,)	
SMART PAPERS LLC,)	
)	
Defendants.)	
_____)	

**SECOND DECLARATION OF MARY RITA WEISSMAN
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Mary Rita Weissman, declare as follows:

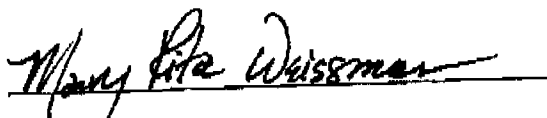
1. My name is Mary Rita Weissman. I am currently employed as a Consultant, Corporate Secretary, and Vice President of Finance at Employee Relations Consultants, Inc. (d/b/a The Weissman Group).
2. I was deposed in this case by plaintiffs on April 9, 2003. This second declaration supplements my deposition and relates to the timing of my employment with Smart Papers. My first declaration was signed on September 30, 2003 and was submitted with Smart Papers' Motion for Summary Judgment.
3. I was contacted by Smart Papers in mid-December 2000 for the purpose of being retained as a human resources consultant for hiring an initial workforce for Smart Papers at the Hamilton B Street Mill.
4. After submitting a proposal for my services, I received a verbal offer in mid-December 2000 from Smart Papers to develop and implement a hiring process for them.

**SUN CAPITAL
EXHIBIT 1**

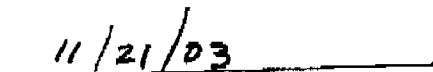
5. By January 5, 2001, I had completed all documents that would be necessary in the hiring process for employment with Smart Papers, including notification letters to employees about the application process, applications for employment, applicant profiles and tracking sheets, and reference check documents.

6. Although I had already been working for Smart Papers since mid-December 2000 under a verbal agreement, I entered into an formal written Employment Agreement with Smart Papers on or around January 11, 2001 to serve as Acting Director of Human Resources for Smart Papers, for the purposes of developing and implementing plans for interviewing, evaluating and hiring an initial workforce for Smart Papers at the Hamilton Mill.

I have reviewed the foregoing and declare under penalty of perjury that it is true and correct to the best of my knowledge, information, and belief.



Mary Rita Weissman



Date